

EXHIBIT G

Page 1

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF TEXAS
3 SHERMAN DIVISION
4 - - -

5 THE STATE OF TEXAS, et al. : Civil Action No.
6 Plaintiffs, : 4:20-cv-00957-SDJ
7 vs. :
8 GOOGLE LLC, :
9 Defendants. :

10 - - -
11 April 19, 2024
12 HIGHLY CONFIDENTIAL
13 - - -

14 Remote Oral Deposition,
15 taken via Zoom, of [REDACTED]
16 commencing at 9:01 a.m., on the above
17 date, before Amanda Maslynsky-Miller,
18 Court Reporter and Certified Realtime
19 Reporter.
20 - - -

21
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24 Job No. MDLG6658171

1 APPEARANCES:

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22 Evan Wolfe, Trial, Technician
23 Melonie Montford Derosé (LLF)
24 Steven Sparling, Google LLC

- - -

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I N D E X

Testimony of: [REDACTED], Ph.D.

By Attorney Chang

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E X H I B I T S

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Exhibit 112	GOOG-AT-MDL-008522383-2404 Perf Rating Support Note Template	52
Exhibit 113	GOOG-AT-MDL-017768272-8275 2/28/22 E-mail, [REDACTED] to [REDACTED]	76
Exhibit 114	GOOG-AT-MDL-016488656-8675 [REDACTED] Promo Packet	93
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DEPOSITION SUPPORT INDEX

- - -

Direction to Witness Not to Answer

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None

Request for Production of Documents

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None

Stipulations

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Question Marked

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None

1 I know we had a quick break
2 for the clawback, but it's been
3 about an hour.

4 ATTORNEY CHANG: Are we --
5 can we get a time check, please?
6 Let's go off the record.

7 VIDEO TECHNICIAN: Off
8 record. The time is 1:02.

9 - - -

10 (Whereupon, a luncheon
11 recess was taken.)

12 - - -

13 VIDEO TECHNICIAN: Back on
14 record. Time is 1:47.

15 BY ATTORNEY CHANG:

16 Q. Before we get into things.

17 [REDACTED] during any of
18 our breaks today did you discuss the
19 substance of your testimony with any of
20 your attorneys?

21 A. No, sir.

22 ATTORNEY CHANG: Mr. Wolfe,
23 will you pull up
24 GOOG-DOJ-32277191?

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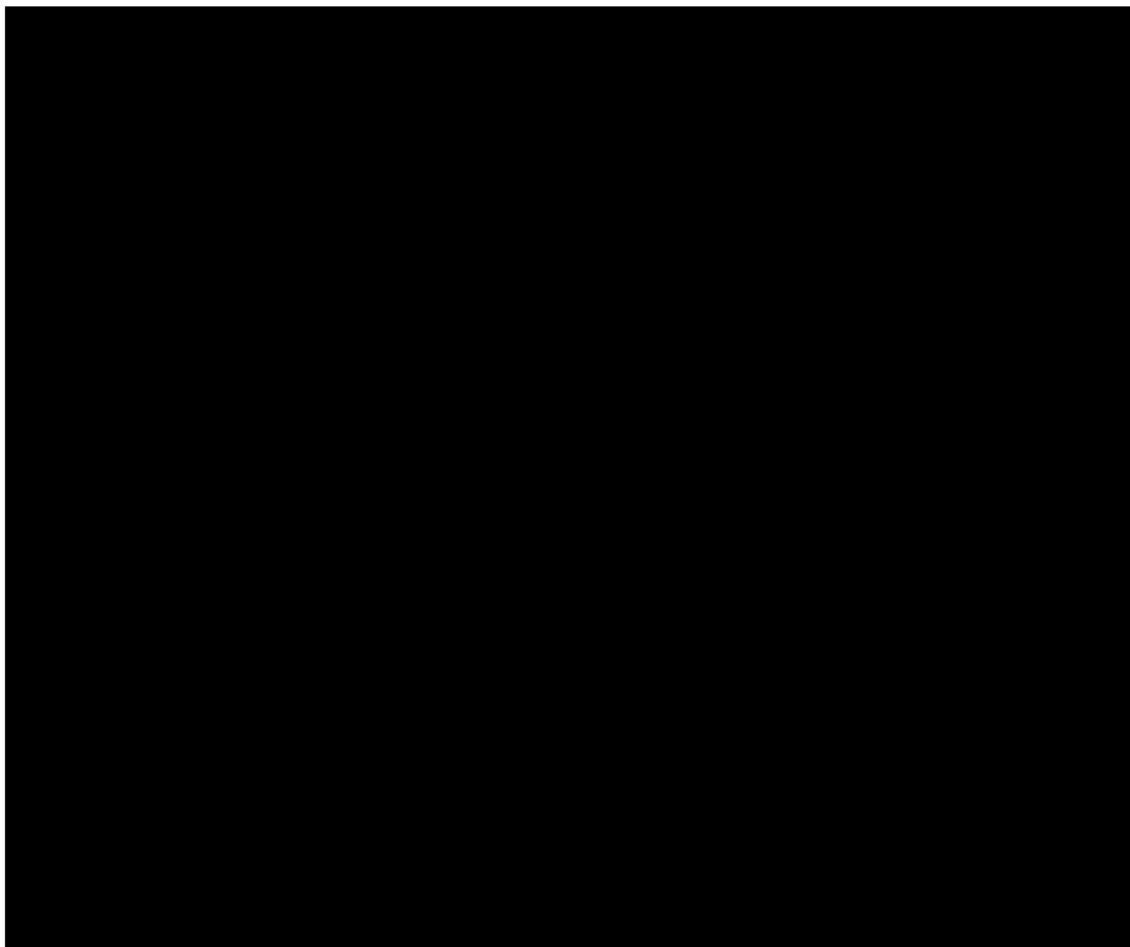
(Whereupon, Exhibit-118,
GOOG-DOJ-32277191-7210, 7/9/14
E-mail, [REDACTED] to [REDACTED] was
marked for identification.)

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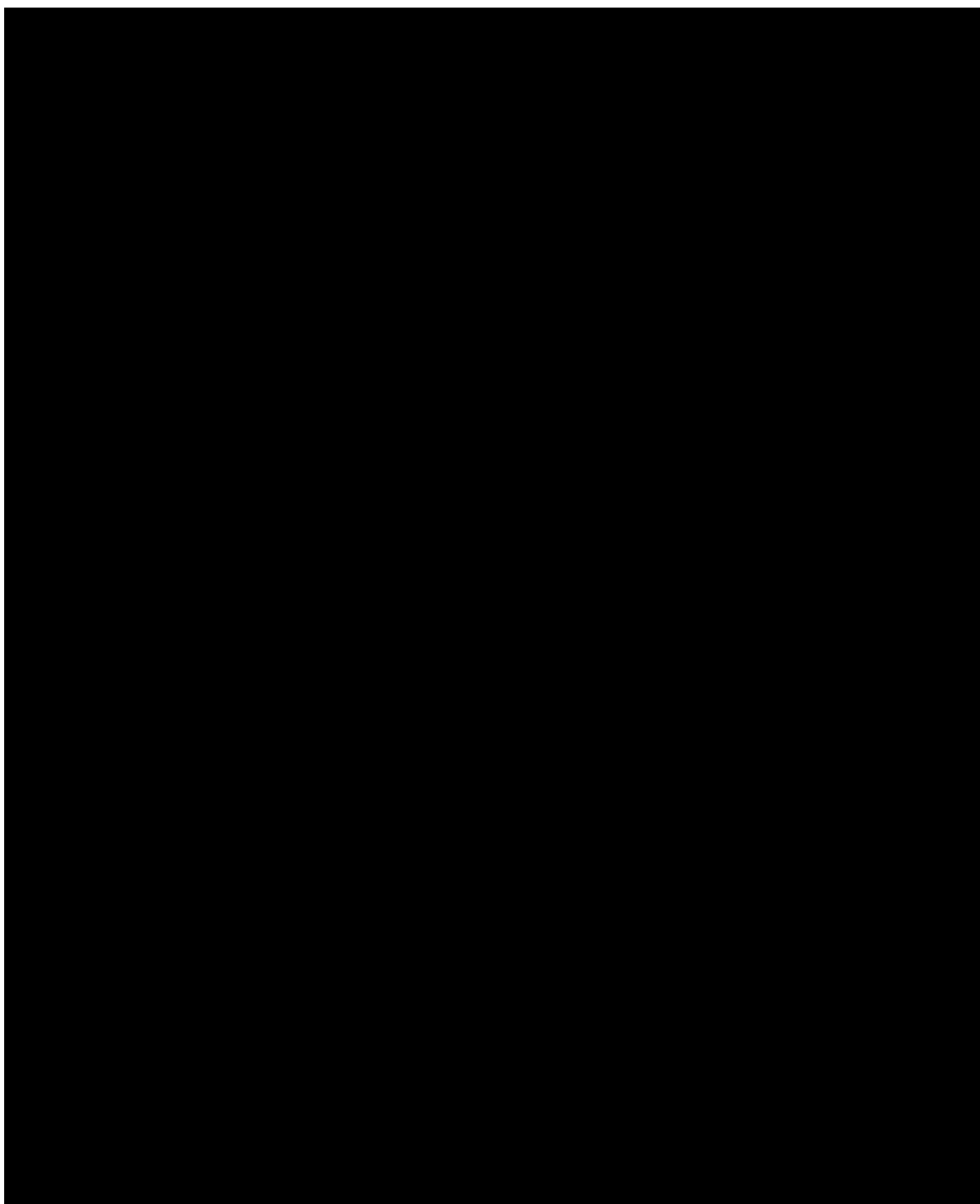
BY ATTORNEY CHANG:

Q. Will you let me know when
you can see the document?

A. I can see the document.



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Q. Thank you.

And I'm just interested --
okay. Well, all right, let me ask you

1 this question first.

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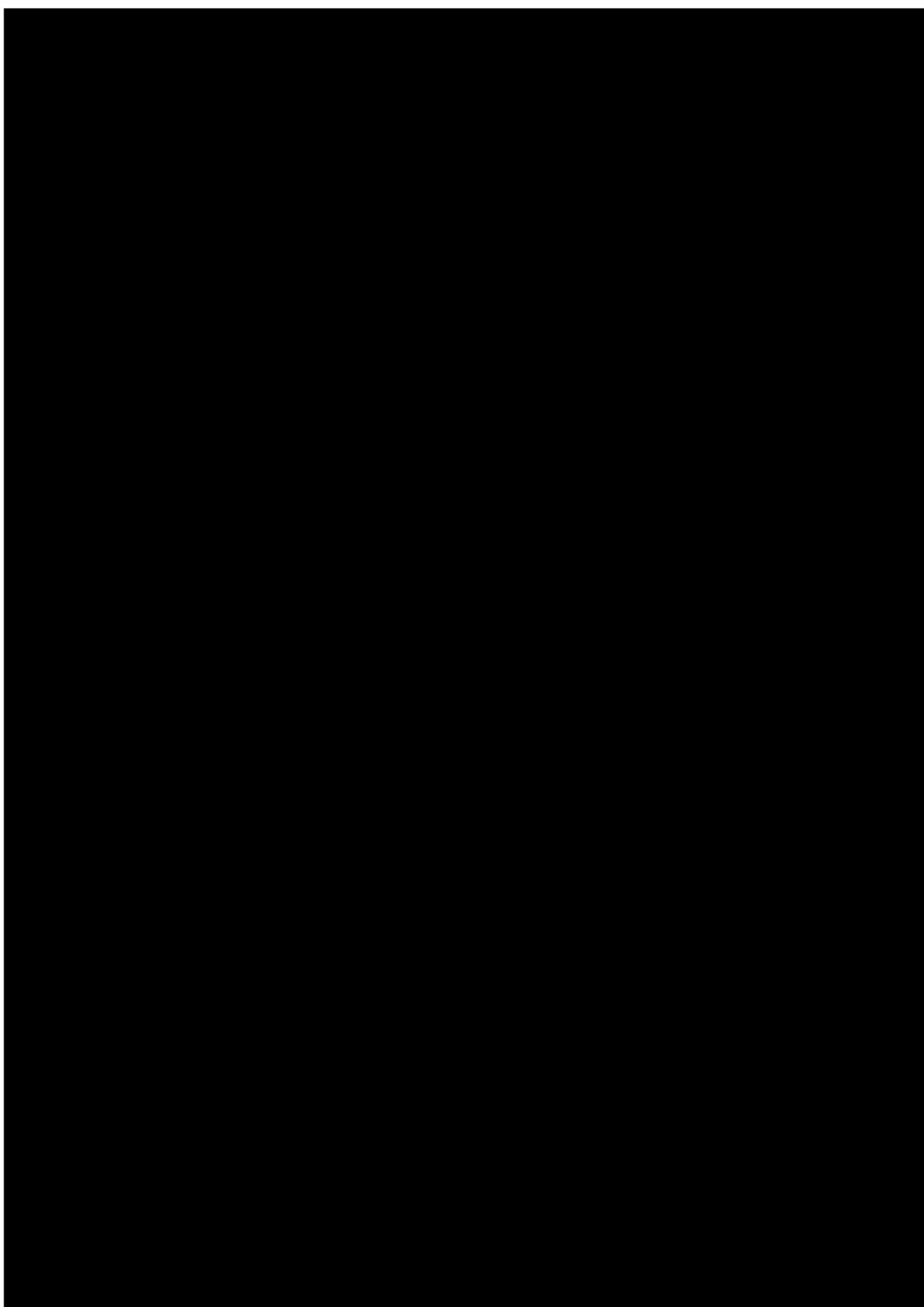
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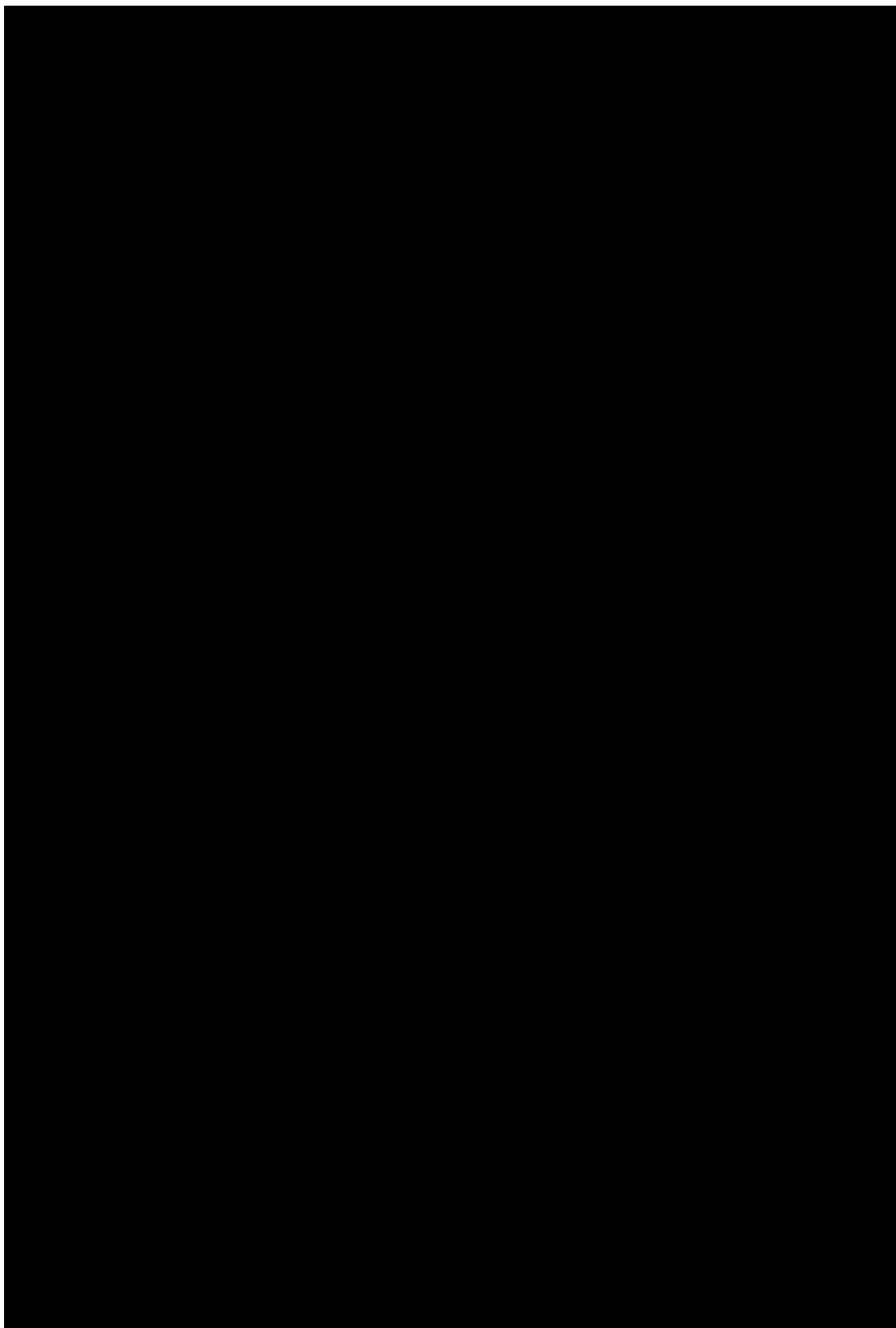
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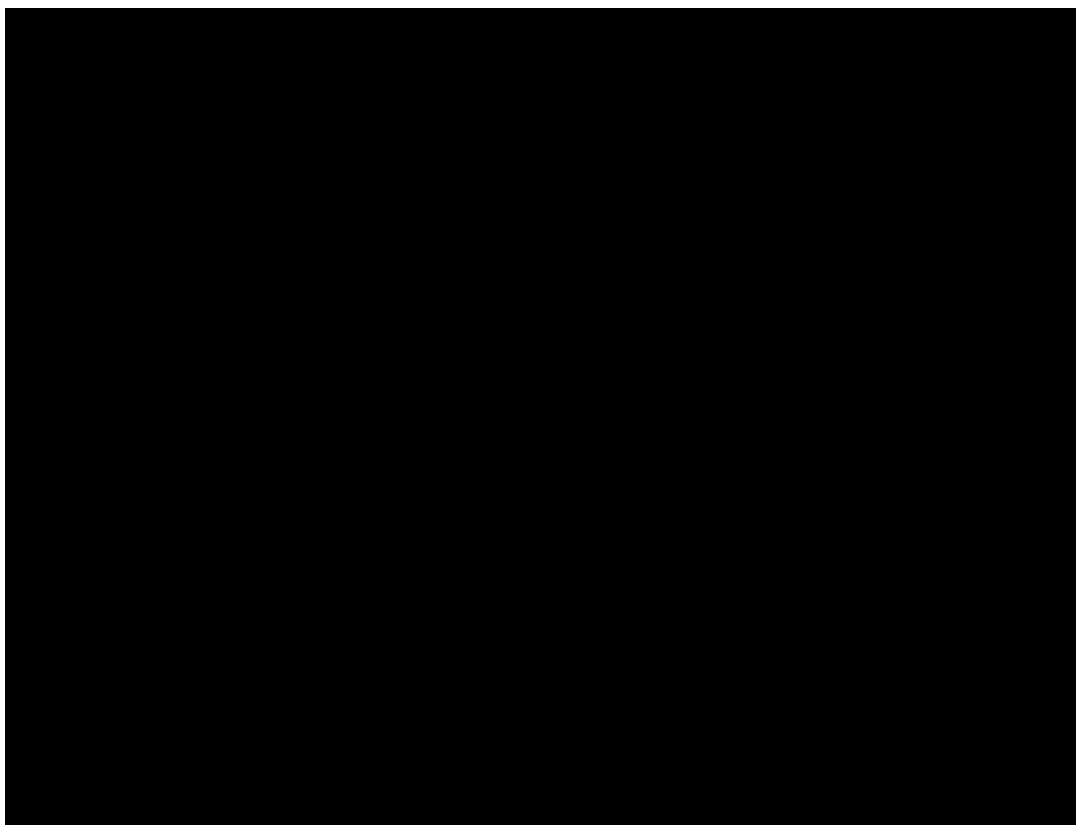
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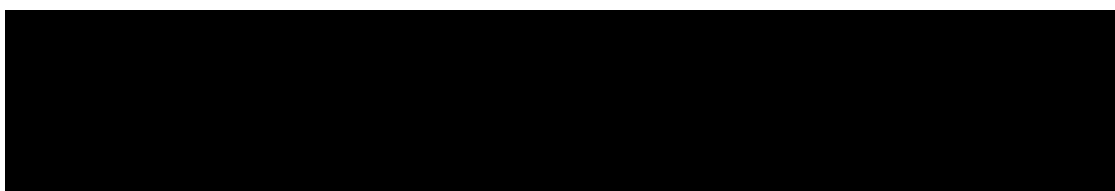


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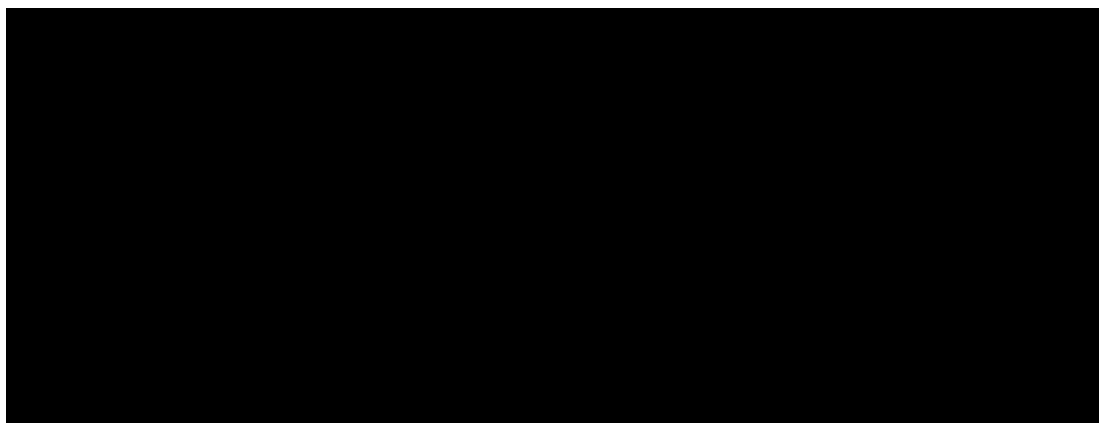


ATTORNEY PEARL: Objection.

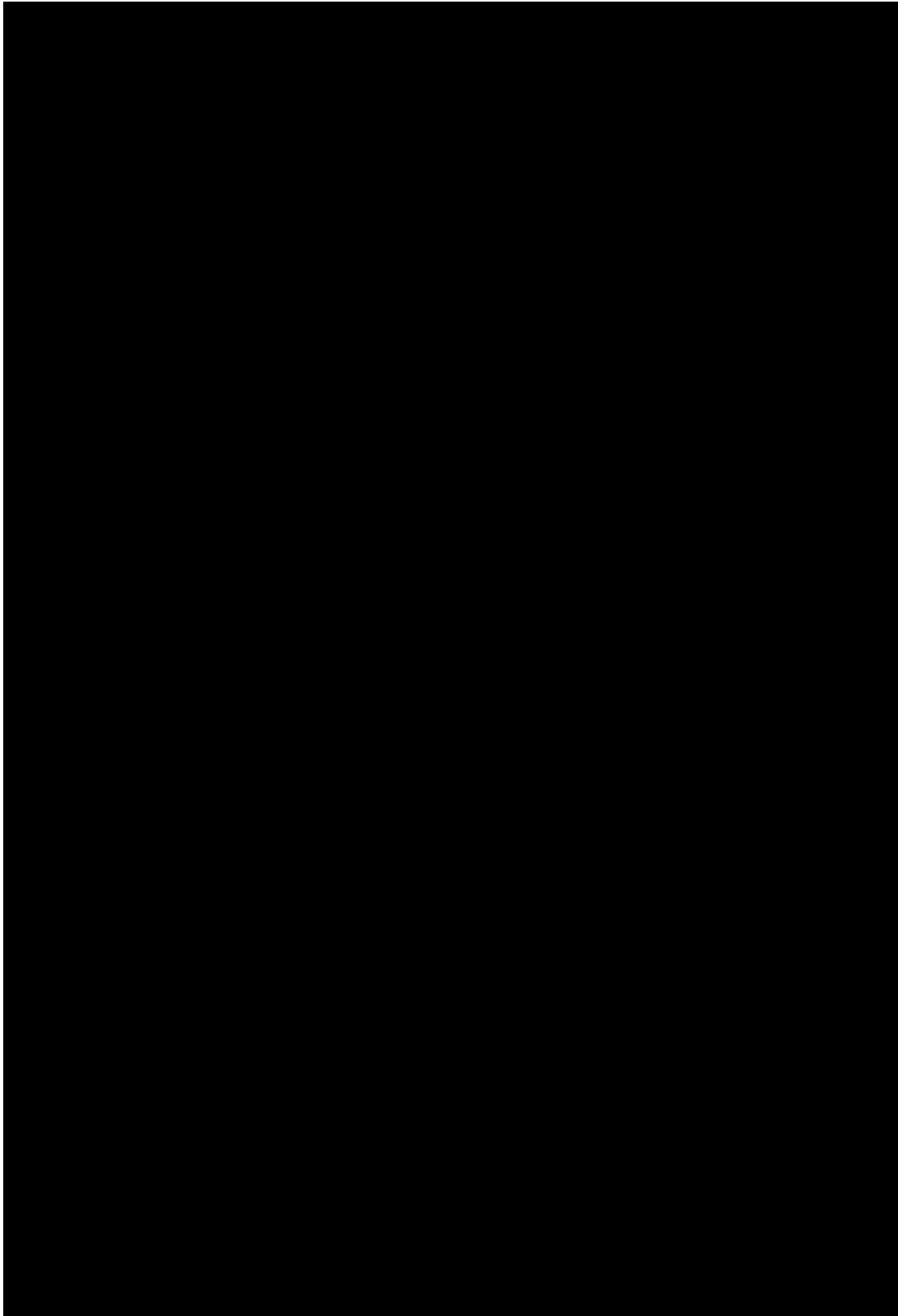
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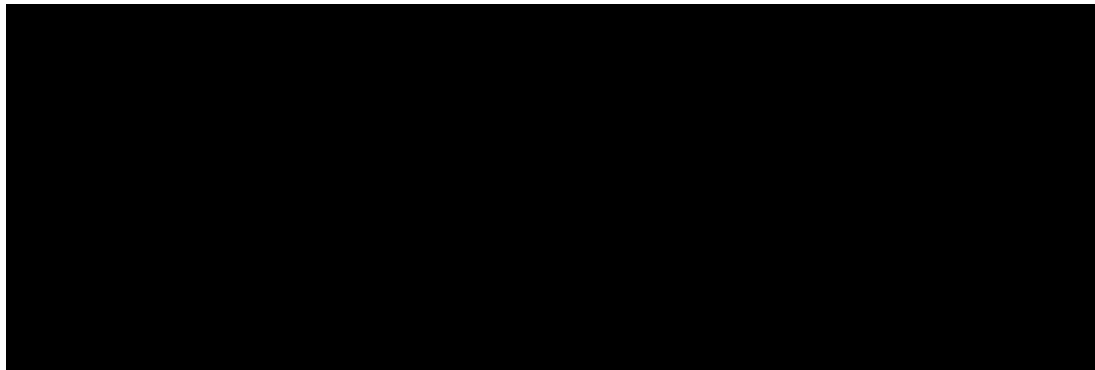
BY ATTORNEY CHANG:



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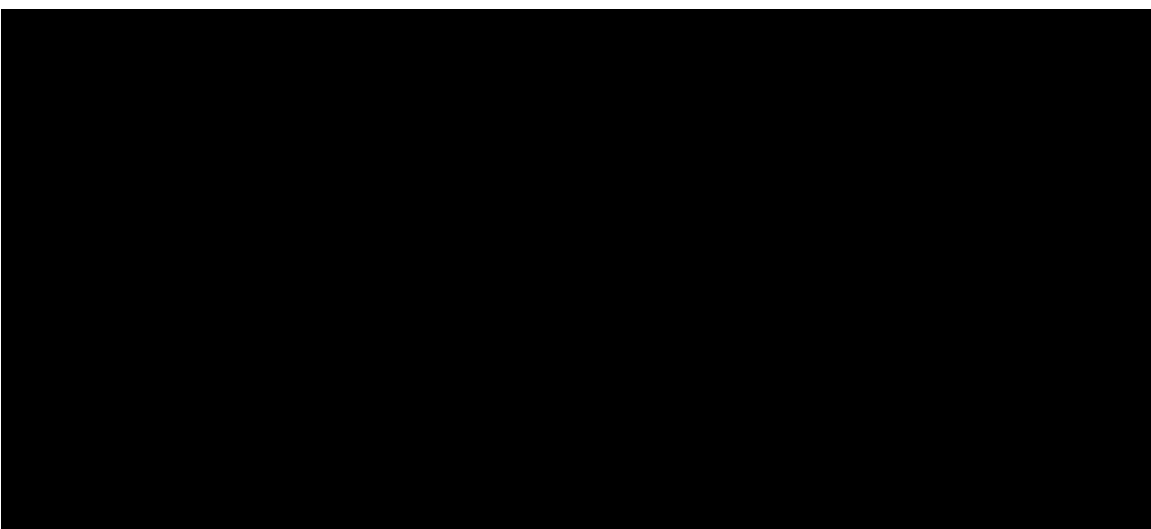


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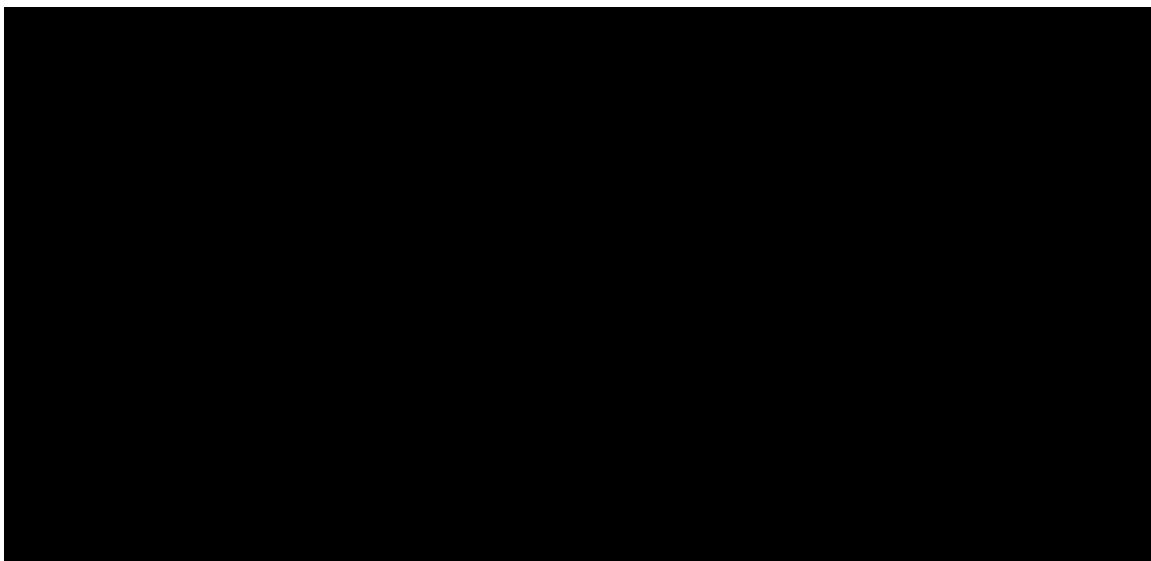


ATTORNEY PEARL: Objection.

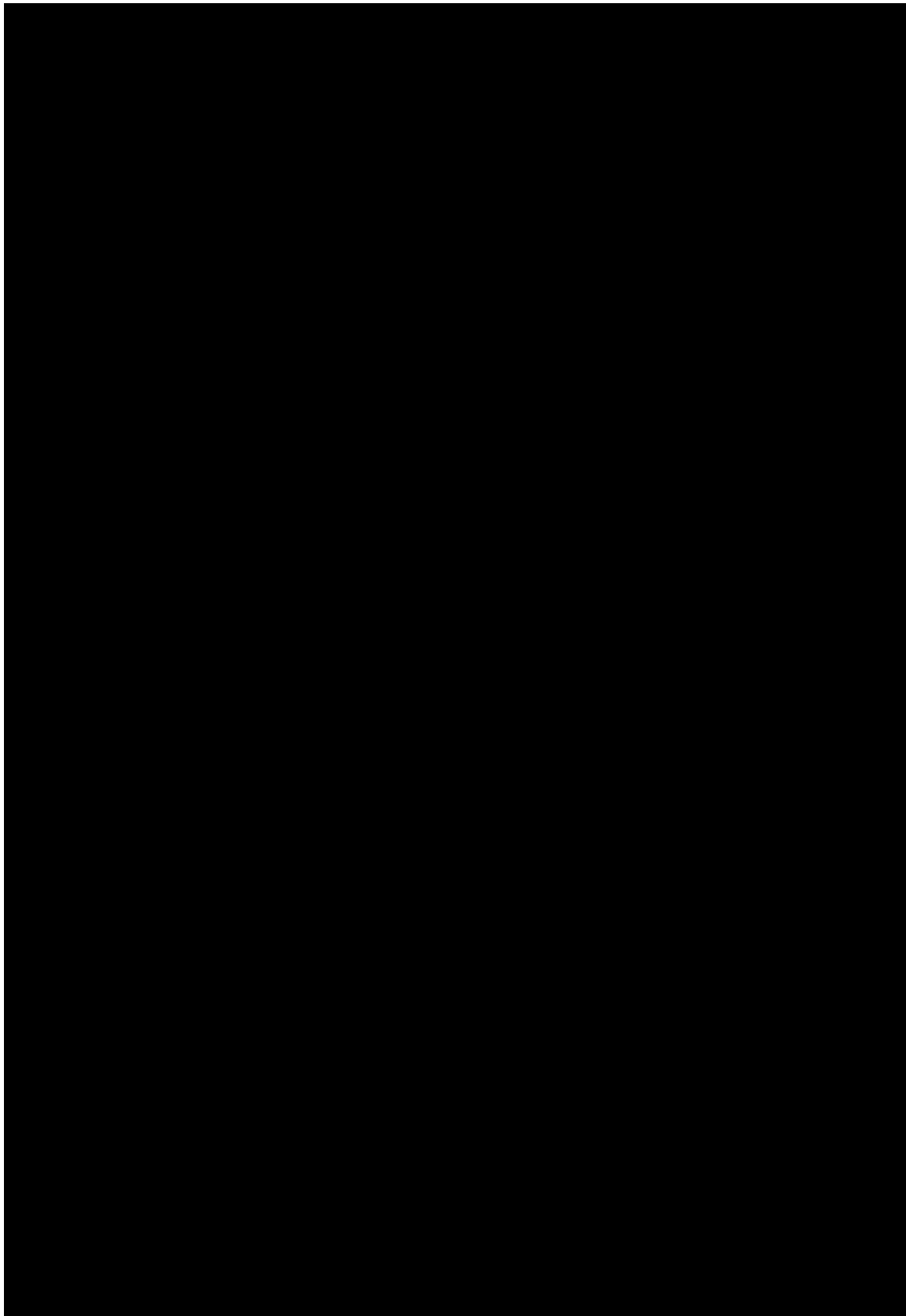
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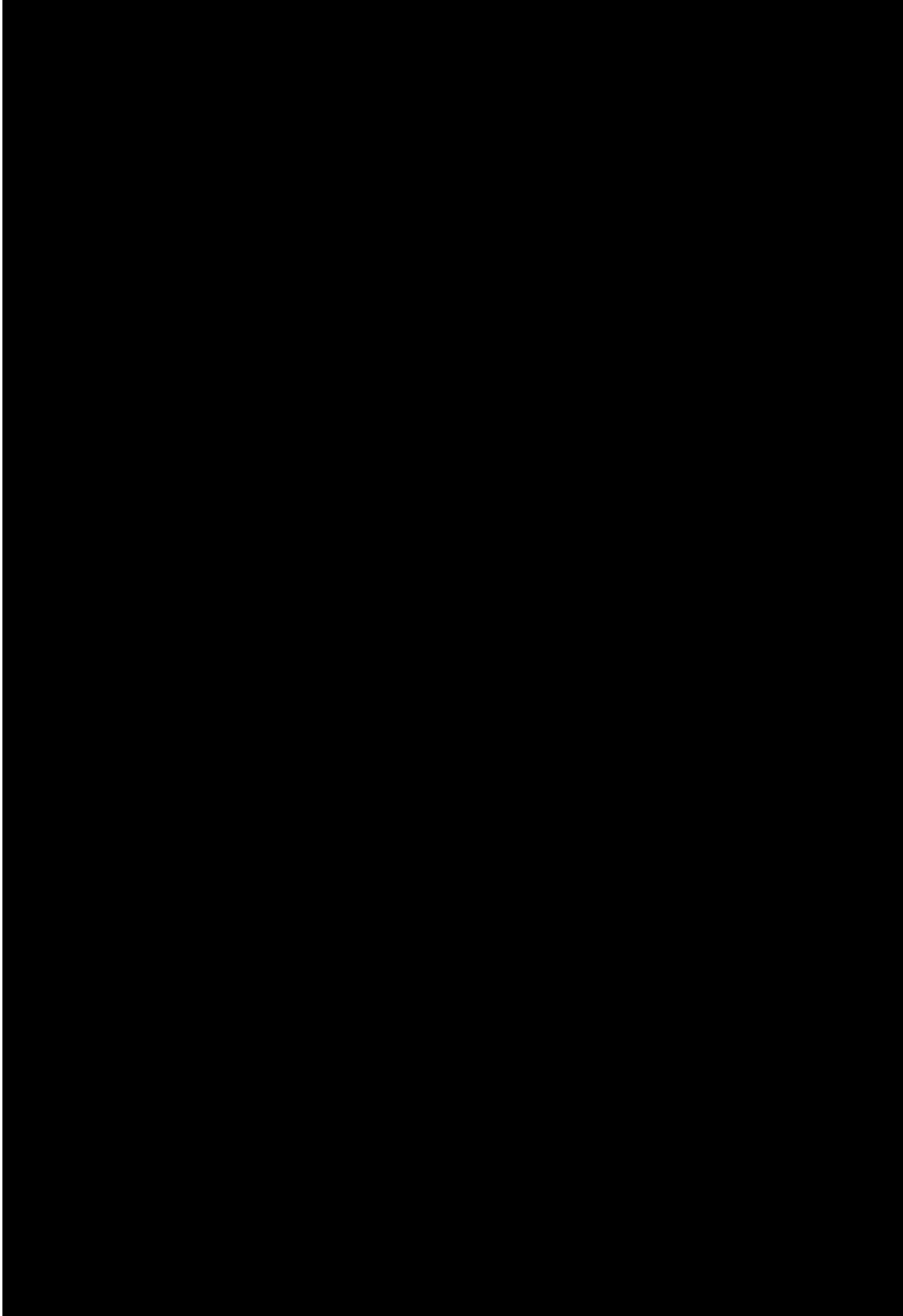
BY ATTORNEY CHANG:



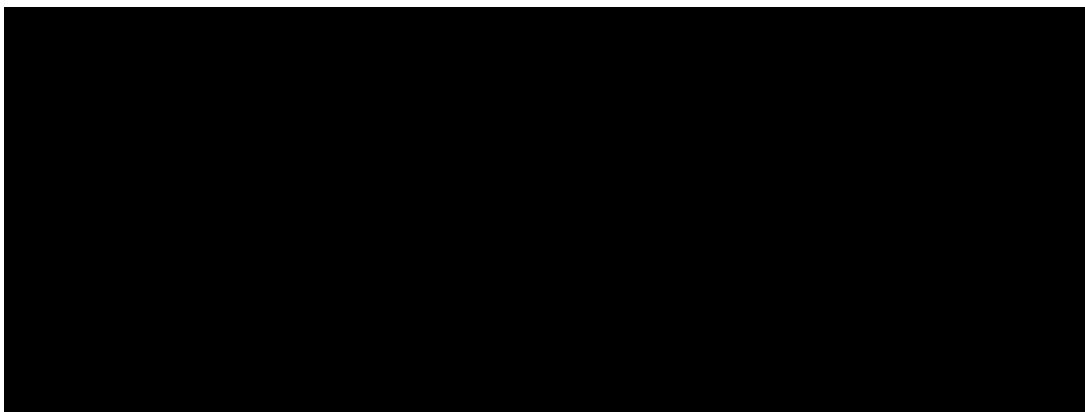
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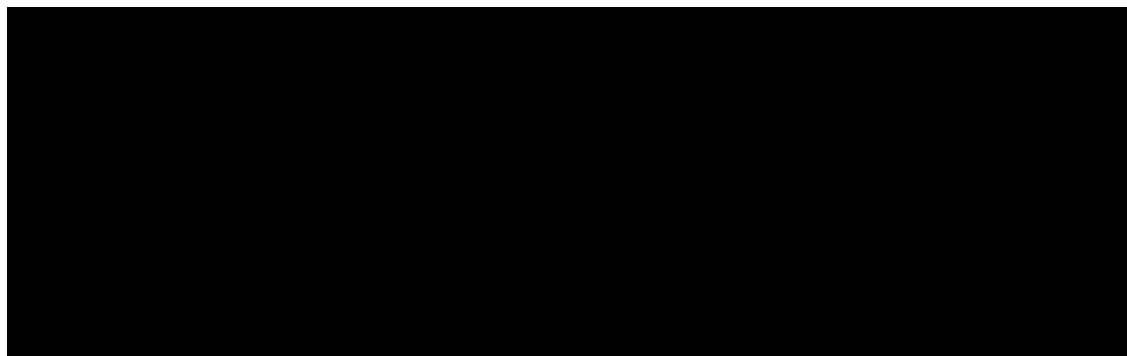
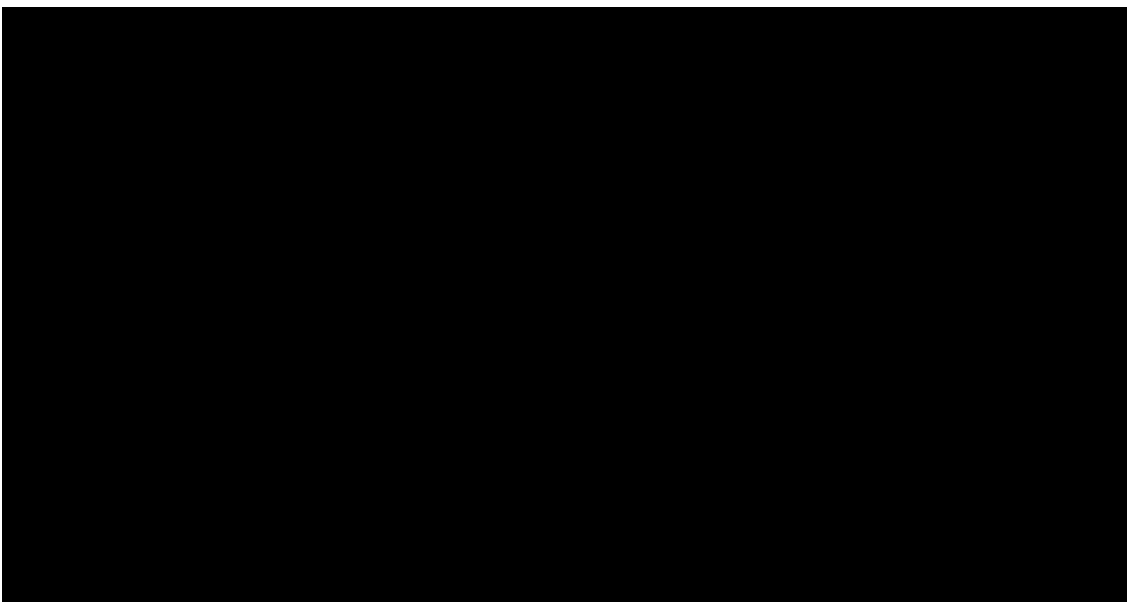


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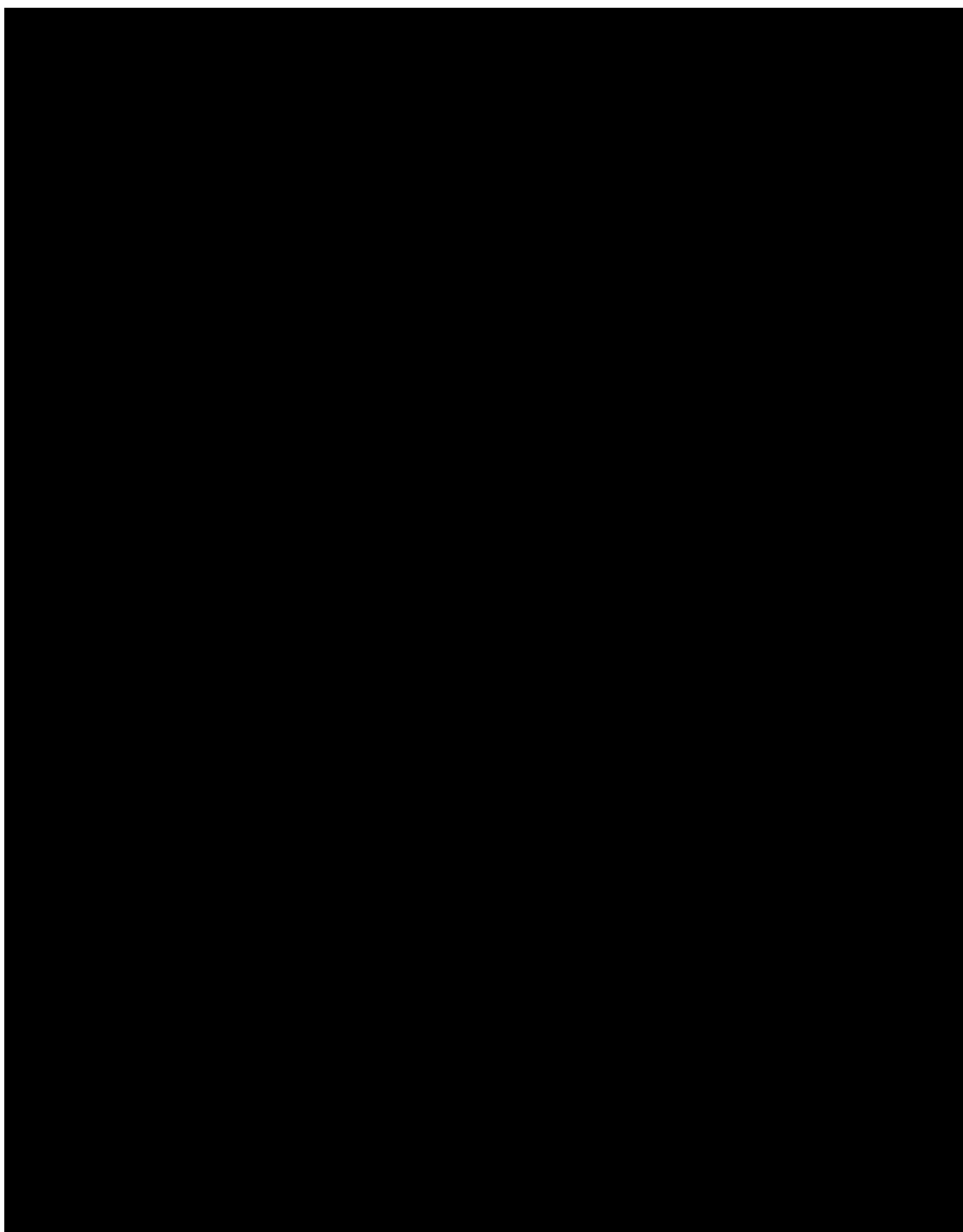


But I certainly don't
remember specifically what
happened.

BY ATTORNEY CHANG:



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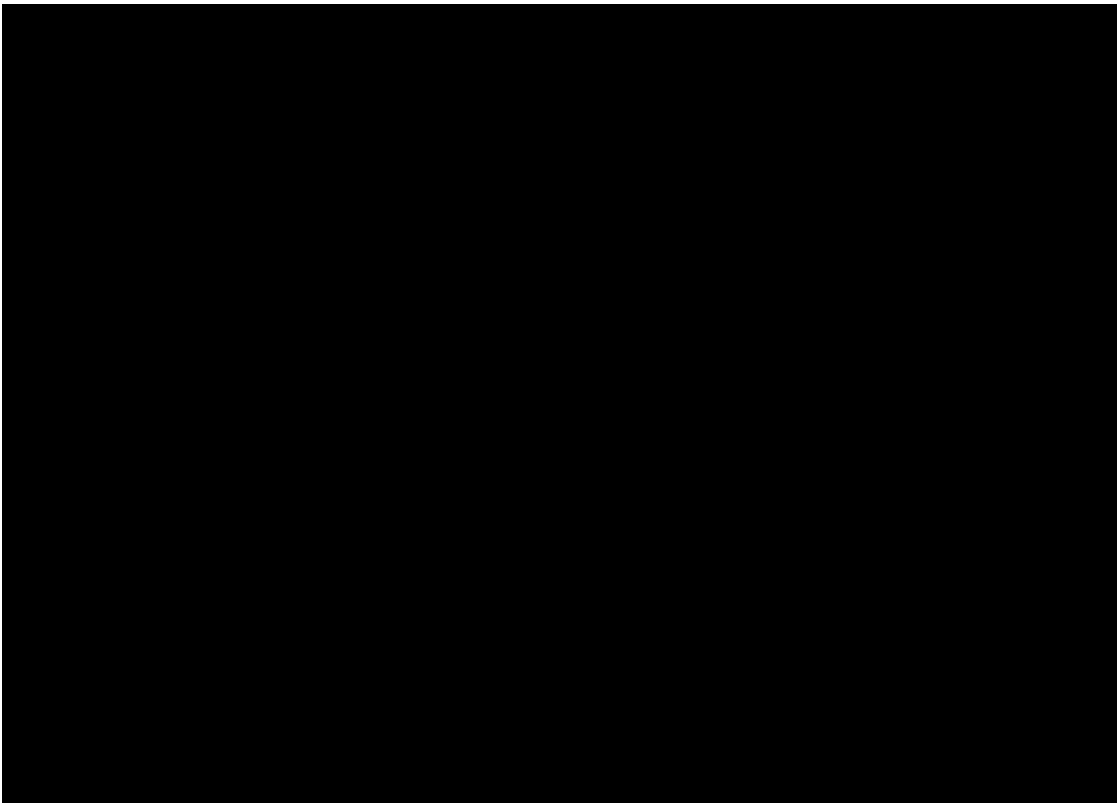


ATTORNEY PEARL: Objection.

Form.



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BY ATTORNEY CHANG:

Q. So you always leave your
Chat history on?

A. I'm sure there have been
some instances, I can't remember the
specific times, when I've turned it off
over my 13 years at Google.

But almost ubiquitously I
make a point to leave it on, because it's
just easier for me to work with my
colleagues in that way and search for
things.

1 A. There may be some days when
2 it's zero. But I would say it's usually
3 at least one Chat conversation.

4 Q. Would you have more than
5 five a day?

6 ATTORNEY PEARL: Objection.
7 Form.

8 THE WITNESS: It's certainly
9 possible.

10 BY ATTORNEY CHANG:

11 Q. How about ten? Would you
12 have more than ten a day?

13 ATTORNEY PEARL: Objection.
14 Form.

15 THE WITNESS: It depends on
16 the day. I'm sure there are days
17 where I've had more than ten.

18 BY ATTORNEY CHANG:

19 Q. Do you ever have Chat
20 conversations that continue over multiple
21 days?

22 A. That has happened.

23 Q. Longer than a week?

24 A. I can't really speculate on

1 that. That seems fairly unlikely, to be
2 honest with you. Usually, Chat is pretty
3 ephemeral.

4 [REDACTED]
5 [REDACTED]

6 ATTORNEY PEARL: Objection
7 to form.

8 [REDACTED]
9 [REDACTED]

10 BY ATTORNEY CHANG:

11 Q. Do you know the process for
12 turning history on and off for a Google
13 Chat?

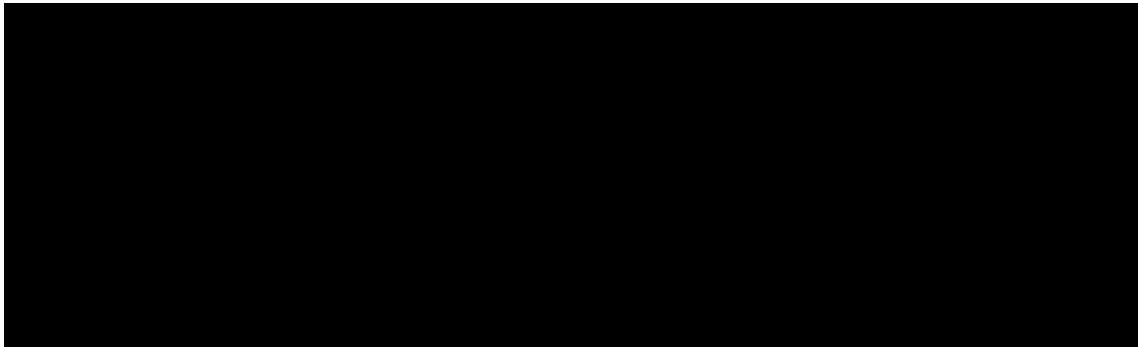
14 ATTORNEY PEARL: Objection.
15 Form.

16 THE WITNESS: Yes, sir. I
17 know how to turn history on and
18 off in Google Chat.

19 BY ATTORNEY CHANG:

20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]

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ATTORNEY CHANG: Mr. Wolfe,
will you take that document down?
Thank you.

BY ATTORNEY CHANG:

Q. Has a Google employee ever
asked to move a Chat conversation
offline?

ATTORNEY PEARL: Objection.
Form.

THE WITNESS: I've certainly
had times when I was in a Chat
with another Google employee where
they may have suggested we meet in
person to discuss something, if
that is your question.

Is that what you mean by
"offline"?

BY ATTORNEY CHANG:

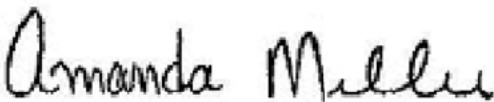
Q. Have you ever asked to take

CERTIFICATE

I, Amanda Maslynsky-Miller, Certified Realtime Reporter, do hereby certify that prior to the commencement of the examination, [REDACTED], was remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



Amanda Miller

Certified Realtime Reporter

Dated: April 22, 2024

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)